

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Crescent Naima Parker a/k/a Crescent
Brown
Debtor,

Nationstar Mortgage LLC
Movant.

v.

Crescent Naima Parker a/k/a Crescent Brown
Debtor/Respondent,

Kenneth E. West, Office of the Chapter 13
Standing Trustee, Trustee
Additional Respondent.

BANKRUPTCY CASE NUMBER
23-10488-pmm

CHAPTER 13

11 U.S.C. § 362

CERTIFICATION OF DEFAULT

The undersigned, Attorney for Movant, certifies that Debtor has defaulted upon the terms of this Court's Stipulation and Order dated August 11, 2023. It is further certified that the attached notice, marked as Exhibit "A," was served upon the Debtor and Debtor's Attorney on March 26, 2024. The Debtor has failed to cure the default as set forth in the Notice. The Debtor has failed to make the following payments:

Regular payments of \$969.81 from January 1, 2024 through February 1, 2024	\$1,939.62;
Regular payments of \$967.65 from March 1, 2024 through April 1, 2024	\$1,935.30;
Attorney Fees associated with this default	\$300.00
Less Debtor's Suspense	\$(771.49)
TOTAL DEFAULT	\$3,403.91

Accordingly, pursuant to the Stipulation and Order, Movant respectfully requests this Court to enter the attached Order granting Movant relief from the automatic stay.

Respectfully submitted,

Dated: April 17, 2024

BY: /s/ Christopher A. DeNardo
Christopher A. DeNardo 78447
Heather Riloff - 309906
Leslie J. Rase, 58365
LOGS Legal Group LLP
985 Old Eagle School Road, Suite 514
Wayne, PA 19087
(610) 278-6800
logsecf@logs.com